

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

ABELSON & TRUESDALE, LLC
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Attorney for the Debtor

In Re:

Kathleen R. Thomas

Case No.: 13-33748

Judge: Kathryn C. Ferguson

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following **(choose one)**:

1. ☐ Motion for Relief from the Automatic Stay filed by _____ ,
creditor,

A hearing has been scheduled for _____ , at _____ .

- ☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for 9/28/2016 , at 9:00 am .

- ☐ Certification of Default filed by _____ ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☐ Payments have been made in the amount of \$ _____ , but have not
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

Due to higher claims filed subsequent to confirmation, the Pot base amount has increased. Debtor proposes to increase the Plan payment to \$664.00 for the remaining 25 months of the Plan to reach the required Pot base amount of \$30,497.00 ($25 \times 664.00 = 16,600.00 + 13,899.00$ paid to date = \$30,499.00).

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 9/21/2016

/s/Kathleen R. Thomas
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.